

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CAN'T STOP PRODUCTIONS, INC.,

Case No.: 7:17-cv-06513-CS

Plaintiffs,

-against-

SIXUVUS, LTD., ERIC ANZALONE, ALEXANDER
BRILEY, FELIPE ROSE, JAMES F. NEWMAN,
RAYMOND SIMPSON, and WILLIAM
WHITEFIELD,

Defendants.

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**DECLARATION OF SARAH M. MATZ IN SUPPORT OF DEFENDANTS’
OPPOSITION TO PROPOSED INTERVENOR’S MOTION TO INTERVENE
AND DEFENDANTS’ CROSS-MOTION TO DISMISS THE PROPOSED
AMENDED INTERVENOR COMPLAINT**

SARAH M. MATZ, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury, as follows:

1. I am an attorney for the Defendants in this action and submit this declaration in support of the Defendants’ opposition to Proposed Intervenor Karen L. Willis’ (“Proposed Intervenor”) motion to intervene and cross-motion to dismiss the proposed amended intervenor complaint.

2. Annexed hereto as **Exhibit 1** is a true and correct copy of the trademark license agreement that was filed with the Court by Proposed Intervenor on December 8, 2017 and subsequently filed on ECF on February 12, 2018.

3. Annexed hereto as **Exhibit 2** is a true and correct copy of the proposed amended complaint filed by Proposed Intervenor on August 26, 2019.

4. Annexed hereto as **Exhibit 3** is a true and correct, redacted copy of the settlement agreement entered into between the Defendants and Plaintiff Can't Stop Productions, Inc. on February 5, 2020.

5. Annexed hereto as **Exhibit 4** is a true and correct copy of the transcript from the February 6, 2020 conference in this action.

6. Annexed hereto as **Exhibit 5** is a true and correct copy of the Court's Order dated February 7, 2020, which was signed by Judge Cathy Seibel.

7. Annexed hereto as **Exhibit 6** is a true and correct copy of the transcript from the May 2, 2019 conference in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 15, 2020, in New York, New York.



SARAH M. MATZ